

V. REMARKS

Claims 1-17 are pending in this application. By this amendment, claims 3-4 have been amended and claims 14-17 have been added. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 3 and 4 are rejected under 35 U.S.C. §112 as allegedly being indefinite. Claims 1-13 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Yamauchi *et al.* (U.S. Patent No. 5,649,102), hereafter "Yamauchi" in view of Hayashi *et al.* (U.S. Patent No. 5,649,102), hereafter "Hayashi."

A. REJECTION OF CLAIMS 3 AND 4 UNDER 35 U.S.C. §112

The Office has asserted that claims 3 and 4 are indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants have amended claim 3 to recite "...the shared scope option." Applicants have also amended claim 4 to replace "...including the step of..." with "...further comprising." Applicants assert that these amendments further clarify the invention. Accordingly, Applicants request that the rejection be withdrawn.

B. REJECTION OF CLAIMS 1-13 UNDER 35 U.S.C. §103(a)

With initial regard to the 35 U.S.C. §103(a) rejection over Yamauchi in view of Hayashi, Applicants assert that there is no motivation for combining the references. Specifically, no reasonable intrinsic or extrinsic justification exists for the proposed combination. In Yamauchi, access to shared data is granted to a particular computer by transferring ownership of the shared data to the computer for a period of time. Col 20, lines 1-5. During this time the owning computer in Yamauchi has complete control of the data and other computers needing access to the data are suspended. Col. 20, lines 1-10. When the computer has completed its use of the data and an ACQUIRE command has been received from another computer, the computer transfers ownership of the data to the other computer. Col. 20, lines 17-19. In contrast, Hayashi teaches two ways of ensuring the integrity of a shared resource, shared processing in which all of the processors symmetrically perform the processing of the integrity guarantee and local processing in which only one processor module assigned to the resource performs the processing of the integrity guarantee. Col. 5, lines 7-19. These two states in Hayashi are toggled depending on whether access to the resource is evenly distributed or one processor dominates access. Col. 5, lines 25-38. As such, the transferred data ownership of Yamauchi is incompatible with the toggled integrity processing states of Hayashi. Accordingly, the Office has failed to prove a *prime facie* case of obviousness and Applicants request withdrawal of the rejection.

With further regard to the 35 U.S.C. §103(a) rejection over Yamauchi in view of Hayashi, Applicants assert that the combined features of the cited references fail to teach or suggest each and every feature of the claimed invention. For example, with respect to independent claims 1, 6, 9, 11 and 12, Applicants submit that, contrary to the assertion of the Office, Hayashi fails to

teach scope definitions for association with respective computer system resources to determine the scope of access and change rights for the computer system resources and for determining whether the computer system resources should be stored in said shared access memory, and for identifying computer system resources to which a command is to be applied by reference to their associated scope definitions. Instead, as stated above, Hayashi teaches toggling resource integrity guarantee modes between a shared processing mode in which all processors perform the processing of the integrity guarantee and a local processing operation in which only one special processor performs this task. Col. 5, lines 7-38. However, Hayashi never teaches that its toggling determines the scope of access and changes rights for the computer system resources; determines whether the computer system resources should be stored in shared access memory; and identifies computer system resources to which a command is to be applied. In contrast, the present invention includes "...scope definitions for association with respective computer system resources to determine the scope of access and change rights for the computer system resources and for determining whether the computer system resources should be stored in said shared access memory, and for identifying computer system resources to which a command is to be applied by reference to their associated scope definitions." Claim 1. As such, the scope definitions of the claimed invention do not merely toggle resource integrity guarantee modes as does Hayashi, but instead are used to determine the scope of access and change rights for computer system resources; to determine whether the computer system resources should be stored in shared access memory; and to identify computer system resources to which a command is to be applied. Thus, the scope definitions as included in the present invention are not

equivalent to the toggling in Hayashi. Yamauchi does not cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claim 1, and with respect to claims 8 and 10, Applicants respectfully submit that, contrary to the Office's assertion, Yamauchi fails to teach or suggest, *inter alia*, at least one command target qualifier indicating that a command should be targeted to all members of the group of cooperating communication managers. In support, the Office cites a passage in Yamauchi that describes a packet that contains a destination computer field, among others. Col. 12, lines 10-18. However, nowhere in the packet fields of Yamauchi is there a field that indicates that a command should be targeted to all members a group. The Office attempts to bridge this gap by relying on the statement in Yamauchi that "...[t]his packet is then transmitted to the computers having the corresponding shared data or to all computers." Col. 12, lines 21-23. However, this passage in Yamauchi still does not teach an indicator located in the packet itself. Instead, this passage teaches that the packet of Yamauchi is always transmitted either to the computers having the corresponding shared data or to all computers. The present invention, in contrast, includes "...at least one command target qualifier indicating that a command should be targeted to all members of the group of cooperating communication managers." Claim 1. As such, in contrast to Yamauchi, the at least one command target qualifier of the claimed invention indicates whether a command should be targeted to all members of the group of cooperating communication managers. Thus, the packet in Yamauchi does not have a field that is equivalent to the at least one command target qualifier of the claimed invention. Hayashi does not cure this deficiency. Accordingly, Applicants request that the rejection be withdrawn.

With further respect to independent claims 6, 9 and 11, Applicants respectfully submit that, contrary to the Office's statement, Yamauchi does not teach or suggest, *inter alia*, a command interface for a computer program for issuing commands for administration of the computer program. Instead, as stated above, Yamauchi teaches a packet that contains a number of fields. Col. 12, lines 10-23. However, Yamauchi teaches that its packets synchronize shared data and does not teach or suggest that they issue commands for administration of a computer program. In contrast, the claimed invention includes "...[a] command interface for a computer program for issuing commands for administration of the computer program." Claim 6. As such, the command interface as included in the claimed invention is not merely used to synchronize shared data as are the packets in Yamauchi, but instead are for issuing commands for administration of the computer program. For the above reason, the command interface of the claimed invention is not equivalent to the packets of Yamauchi. Hayashi does not cure this deficiency. Accordingly, Applicants request that the Office's rejection be withdrawn.

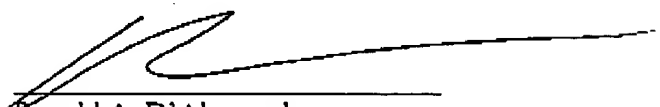
With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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